REMARKS

Claims 1-3 and 7-30 are pending in this application. By this Amendment, claims 1, 16, and 19 are amended and claims 4-6 are canceled. Support for these amendments can be found, for example, in paragraph [0063] of the Specification. No new matter is added.

Applicants appreciate the courtesies shown to Applicants' representative by Examiner Daniels in the June 8 personal interview. Applicants' separate record of the substance of the interview is incorporated into the following remarks.

I. Election/Restrictions

In response to the Election of Species Requirement, Applicants respectfully assert that at least claims 1 and 16 are generic. Furthermore, Applicants respectfully assert that at least claims 1-9, 11-20, and 22-30 read on the elected species.

Applicants traverse the election of species requirement on the ground that the generic claims are not so broad as to place an undue burden on the Patent Office to search and examine the full scope of the claims. Rather, Applicants respectfully assert that search and examination of the entire application could be conducted without undue burden on the Examiner, thus avoiding delay and expense to Applicants.

Applicants further understand, however, that upon search, examination and allowance of the elected species, search and examination will continue as to the non-elected species within the scope of the generic claims.

II. Double Patenting

The Office Action provisionally rejects claims 1-4 under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 1 and 8 of U.S. Patent Application No. 11/032,731. Without admitting to the propriety of the rejection, and in the interest of advancing prosecution, Applicants are simultaneously filing herewith a

Terminal Disclaimer over the cited reference, thus obviating the rejection. Accordingly, reconsideration and withdrawal of the rejection are respectfully requested.

III. Rejections Under 35 U.S.C. §103

A. Foltz in view of Taniishi

Claims 1, 2, 4-9, 11-14, 16-20, 22, 23, 29, and 30 are rejected under 35 U.S.C. §103(a) as unpatentable over U.S. Patent 6,277,534 to Foltz et al. ("Foltz") in view of U.S. Patent 4,291,505 to Taniishi et al. ("Taniishi"). Claims 4-6 are canceled, thus the rejection as to those claims is moot. As to the remaining claims, this rejection is respectfully traversed.

1. Foltz

The Office Action asserts, "in order for the layers to have a substantial amount of built-in internal strain, as taught by Foltz . . . they would have implicitly had coefficients of thermal expansion that differed significantly, producing the observed internal strain as a result of the contraction during cooling" (emphasis added). The relevant portion of amended claim 1 recites, "the at least one layer to be treated having a coefficient of thermal expansion significantly differing from a coefficient of thermal expansion of another layer . . . ." Amended claim 16 recites similar relevant language.

However, Foltz teaches that the internal tensile strain is "due to the counter balancing force exerted by the anti-curl backing layer . . . ." Foltz 2:45-47. Foltz further teaches that when a multilayered web stock has no anti-curl backing layer, the charge transport layer is substantially stress free after it is cooled, indicating that without the anti-curl backing layer there are no differing coefficients of thermal expansion. Alternatively, the instant specification indicates that an anti-curl backing layer is optional, but significantly differing coefficients of thermal expansion are recited in various claims. Therefore, even without an anti-curl backing layer, the present features of claims 1 and 16 would still have significantly differing coefficients of thermal expansion, which is inconsistent with the teaching of Foltz.

Therefore, Foltz does not teach or suggest the stress/strain relief process of claims 1 and 16. Accordingly, reconsideration and withdrawal of the rejection are respectfully requested.

2. Combination of Foltz and Taniishi

The Office Action asserts Foltz teaches that belt ripples are a known problem, and that Taniishi teaches the use of a crowned roller to create transverse stress in the belts in order to avoid wrinkle formation.

The relevant portion of amended claim 1 recites ". . . passing the multilayered web stock over and in contact with a first concave or reversed-crown wrinkle-reducing roller . . . , wherein the first wrinkle-reducing roller has a center diameter from about 1 to about 4 inches and a differential diameter between ends of the roller and a center of the roller of from about 0.002 to about 0.1 inch." Amended claim 16 recites similar relevant language.

According to the claimed invention, use of the wrinkle-reducing roller eliminates the formation of micro-ripples. Micro-ripples are generally formed as the web stock is transported over the treatment tube and instantaneously heated to a high temperature above the glass transformation temperature of the imaging member, where the web stock is free to expand in the web direction. However, transversal expansion is restricted and the back side of the imaging member web to accommodate the cross web dimension increase, which thereby results in web direction ripple lines formation. These micro-ripple lines are not the same as the wrinkles disclosed in Foltz or Taniishi.

The wrinkles disclosed and addressed by Foltz are wrinkles developed during the operation of previously known photoreceptors, that is, during printing operations where the photoreceptor belt is used to form printed images. These wrinkles may occur, for example, regardless of any stress/strain relief process used in making the photoreceptor belt. The wrinkles of Foltz are not micro-ripples formed during the stress/strain relief process used in initially forming the photoreceptor belt, as is disclosed in the present specification. See Foltz

2:47-52 and 3:51-53. Additionally, Foltz teaches its process solves the belt wrinkle problems disclosed therein, but nowhere teaches or suggests a problem associated with micro-ripples created during a stress/strain relief process, or any means to address such a problem. As a result, the claimed method does not necessarily obviate the need for a wrinkle-reducing roller during use of the belt, such as in Foltz. Likewise, the wrinkle-reducing roller of Foltz would not necessarily eliminate (during the imaging process) any micro-ripples that may be present in the belt.

Therefore, the problem of micro-ripple lines created during the stress/strain relief process is not addressed by Foltz. Such micro-ripple lines are only addressed by the claimed invention. For example, Comparative Examples I and II in the instant specification, which is a stress/strain relief process without the wrinkle-reducing roller, shows that micro-ripples are present after this stress/strain relief process and visible when the web stock is viewed under 100 times magnification. Specification [0095]-[0100]. Conversely, when the stress/strain relief process of embodiments of the claimed invention is employed, as disclosed by Example I of the present specification, the micro-ripples are not present under 100 times magnification. These Examples show that the ripples disclosed in Foltz are not the same as the micro-ripples addressed by the present invention.

Taniishi does not address the deficiencies of Foltz. Taniishi teaches a process for forming a negative crowned roller for use in an electrophotographic apparatus to keep visible wrinkles from forming on the support material. Taniishi does not address the micro-ripples discussed above nor does it teach or suggest the use of the negative-crowned roller in a manufacturing process. Further, the roller disclosed in Taniishi has a silicone rubber surface that will flatten larger diameter portions of the negative-crowned roller when pressure is exerted on the roller from the web stock during the stress/strain relief process. Once the negative-crowned roller is flattened, the roller's effectiveness in applying a transverse tension

and providing normal entry into the process roller is negated. Accordingly, even if the roller of Taniishi was used in the claimed process, it would not create the required transverse tension stress. Therefore, Foltz and Taniishi, individually or combined, would not have rendered obvious the invention of claims 1 and 16.

Claims 1 and 16 would not have been rendered obvious by Foltz and Taniishi. Claims 2, 7-9, 11-14, 17-20, 22, 23, 29, and 30 variously depend from claims 1 and 16 and, thus, also would not have been rendered obvious by Foltz and Taniishi. Accordingly, reconsideration and withdrawal of the rejection are respectfully requested.

B. Foltz in view of Taniishi further in view of Yu

Claims 3 and 24-25 are rejected under 35 U.S.C. §103(a) as unpatentable over Foltz in view of Taniishi, and further in view of U.S. Patent 6,068,722 to Yu et al. ("Yu"). This rejection is respectfully traversed.

For at least the reasons stated above, claims 1 and 16 would not have been rendered obvious by Foltz and Taniishi. Yu does not address the discrepancies of Foltz and Taniishi as to claims 1 and 16. Therefore, claims 1 and 16 would not have been rendered obvious by Foltz, Taniishi, and Yu. Claims 3 and 24-25 variously depend from claims 1 and 16 and, thus, also would not have been rendered obvious by Foltz, Taniishi, and Yu. Accordingly, reconsideration and withdrawal of the rejection are respectfully requested.

C. Foltz in view of Taniishi further in view of Wellenhofer

Claim 15 is rejected under 35 U.S.C. §103(a) as unpatentable over Foltz in view of Taniishi, and further in view of German Patent No. 28 33 189 to Wellenhofer et al. ("Wellenhofer"). This rejection is respectfully traversed.

For at least the reasons stated above, claim 1 would not have been rendered obvious by Foltz and Taniishi. Wellenhofer does not address the discrepancies of Foltz and Taniishi as to claim 1. Therefore, claim 1 would not have been rendered obvious by Foltz, Taniishi,

and Wellenhofer. Claim 15 depends from claim 1 and, thus, also would not have been rendered obvious by Foltz, Taniishi, and Wellenhofer. Accordingly, reconsideration and withdrawal of the rejection are respectfully requested.

D. Foltz in view of Taniishi further in view of Yu and Wellenhofer

Claims 26-28 are rejected under 35 U.S.C. §103(a) as unpatentable over Foltz in view of Taniishi, and further in view of Yu and Wellenhofer. This rejection is respectfully traversed.

For at least the reasons stated above, claim 16 would not have been rendered obvious by Foltz and Taniishi. Yu and Wellenhofer do not address the discrepancies of Foltz and Taniishi as to claim 16. Therefore, claim 16 would not have been rendered obvious by Foltz, Taniishi, Yu, and Wellenhofer. Claims 26-28 depend from claim 16 and, thus, also would not have been rendered obvious by Foltz, Taniishi, Yu, and Wellenhofer. Accordingly, reconsideration and withdrawal of the rejection are respectfully requested.

IV. Conclusion

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of the claims are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

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Attachment:
Terminal Disclaimer

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